

January 25, 2022

By ECF

The Honorable Jesse M. Furman United States District Court Judge for the Southern District of New York Thurgood Marshall **United States Courthouse** 40 Foley Square New York, New York 10007

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Karine Travieso v. Major League Soccer, L.L.C. et al., No. 1:21-cv-06998-JMF

Dear Judge Furman:

We represent Defendants Major League Soccer, L.L.C., JoAnn Neale, and Gary Stevenson ("Defendants") in the above-captioned action. We write jointly with Plaintiff Karine Travieso ("Plaintiff") pursuant to Rule 1.F. of Your Honor's Individual Rules and Practices in Civil Cases and the Notice of Initial Pretrial Conference ordered by Your Honor on August 23, 2021 (ECF 10), to respectfully request a brief extension from January 27, 2022 until February 17, 2022 for the parties to file a joint letter, as well as a proposed Civil Case Management Plan and Scheduling Order, and an adjournment of the initial pretrial conference from February 3, 2022 to February 24, 2022.

The parties seek the adjournment and corresponding extension because on December 17, 2021, the parties participated in Court-ordered mediation and those discussions are still ongoing. In the event those discussions are successful, the initial conference and related submissions will not be necessary. The parties should know whether or not they will proceed with litigation by February 17, 2022 (the parties' proposed deadline for their joint letter and Case Management Plan).

As noted above, the parties' next scheduled appearance is February 3, 2022, and the deadline for the pre-conference submissions is January 27. This is the parties' second request to adjourn these deadlines. The parties make the instant request to allow them to continue discussions from the mediation and in an effort to conserve the Court's and parties' resources.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

All Counsel of Record via ECF cc:

Application GRANTED. The initial pretrial conference is hereby adjourned to March 2, 2022, at 2:00 p.m. The parties' preconference submissions will be due February 24, 2022. The Clerk of Court is directed to terminate ECF No. 24. SO ORDERED.

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